



U.S. Department of Justice
United States Attorney
District of New Jersey

February 28, 2024

Via E-Mail and ECF

Hon. Michael E. Farbiarz, U.S.D.J.
United States District Court
Frank R. Lautenberg Post Office & U.S. Courthouse
Newark, New Jersey 07102

Re: United States v. Michael Healy
Crim. No. 18-703

Dear Judge Farbiarz:

The Government writes to update the Court on scheduling and to make a request to begin opening statements on March 12th instead of March 11th for the reasons set forth below. As the Court is aware, based on an agreement made with counsel and approved by the Court, Matthew Robinson will not testify until March 18th at the earliest. The Court also is aware of the stipulation entered by the parties regarding Mr. Healy's gang affiliation. After further consideration, that stipulation negates the Government's need to call four witnesses that were previously scheduled for week one: two witnesses from the Maryland corrections system and two witnesses from the Los Angeles County Sheriff's Office. HSI TFO James Paul Lindley, based in Illinois, is unavailable to testify on March 14 due to travel obligations. In the likely event that the Government will only be able to fill three trial days with testimony during the week of March 11th, the parties have conferred and collectively prefer that the testimony commence on March 12th, rather than creating a four-day gap between testimony. The Government's request to start opening statements one day later, on Tuesday the 12th, will not delay the case as the Government still expects its case-in-chief to end on or before April 5th. The extra day will allow the parties, in consultation with the Court, to resolve outstanding issues. Taking witnesses out of order before Matthew Robinson would cause confusion in the presentation of the evidence.

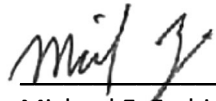
Defense counsel consents to this requested scheduling change. The Government thanks the Court for considering this request.

Respectfully,
PHILIP R. SELLINGER
United States Attorney

By: /s/ Robert Frazer
Robert Frazer
Samantha C. Fasanello
Assistant U.S. Attorneys

Cc. Stephen Turano, Esq.
Tom Ambrosio, Esq.

SO ORDERED.

A handwritten signature in black ink, appearing to read "Michael E. Farbiarz", is written over a horizontal line.

Michael E. Farbiarz, U.S.D.J.

Date: